

William Cummings, Plaintiff

A. WELLER, et al

CIV. No. 1:22-cv-1119

Response to Defendants
MOTION TO DISMISS

- ① I, Plaintiff, William Cummings, move this motion to dismiss be denied because pursuant to the Federal Rule of Civil Procedure, Plaintiff has in fact state claims where upon relief can be granted. These facts, claims, must be submitted to the jury for findings of fact.
- ② Each claim Plaintiff presented to this honorable, can be granted relief. All the claims are exhausted, are not ambiguous, no guessing how to be done etc.
- ③ The Defendants haven't answered the complaint, so Plaintiff moves this court to set a time and date for them to do so. Now, Plaintiff moves this honorable court to send the plaintiff the amount of Waiver Forms, and notice of lawsuit forms needed to serve these Defendants, the ones that haven't been. Please hear with me, I still have a concussion, no medical staff has evaluated me for it, outside of a minute sick call at the cell door in the AHE. Plaintiff moves in the interest of justice to be appointed counsel because Plaintiff cannot focus on the matters at hand, still gets extremely dizzy, cannot concentrate, vomits because of the dizzy, Plaintiff is all jacked up. Please help.
- ④ Sorry if this response isn't up to par, but the concussion, seeing tracers, and still having to deal with these Defendants daily is thwarting the judicial process on the most basic level 4 me. Please help me. Defendant TROUTMAN consistently threatens me and my life, he refuses to allow me in the law library, he's just too much. Sorry for all this Judges Mannion and Carlton. And Defendant Smith just started yelling and doing all the 8th AMDT. violations, which have no penological interests. They're mad and becoming even more deranged!
- ⑤ So in closing, sorry if this response is wrong or against the rules, sorry for not having a brief if I'm supposed to, it's because TROUTMAN and DEFENDANT WATKINS won't allow me in the law library to research, please appoint me counsel in the interest of justice and in the name of Almighty God. The motion to dismiss should be denied. Please help me, I think I'm dying or something, the headacher keep me in bed all day, its been a month.

Proof of Service

DATE: 11/22/22

Respectfully Submitted,

W. J.

FILED
SCRANTON

NOV 28 2022

PER dw
DEPUTY CLERK

I have served the Defendants.
Please send these Defendants a copy of
this document so they can't say they
didn't receive it.

William Cummings 6X8328
1111 Altamont Blvd
Frankville, PA 17431
(legal mail)

RECEIVED
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